

FISHER & PHILLIPS LLP
 300 S Fourth Street, Suite 1500
 Las Vegas, Nevada 89101

FISHER & PHILLIPS LLP
 MARK RICCIARDI, ESQ.
 Nevada Bar No. 3141
 BRANDON A. BORN, ESQ.
 Nevada Bar No. 15181
 300 S. Fourth Street, Suite 1500
 Las Vegas, NV 89101
 Telephone: (702) 252-3131
mr Ricciardi@fisherphillips.com
bborn@fisherphillips.com

JASON KECK, ESQ.
 Admitted pro hac vice
 10 S. Wacker Drive, Suite 3450
 Chicago, IL 60606
 (312) 3346-8061
jkeck@fisherphillips.com
Attorneys for Defendants
Security 1st Title of Nevada, LLC,
Syndeo Outsourcing, LLC, and
Syndeo Outsourcing II, LLC

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

JEFFREY HARRIS, an individual;) Case No: 2:24-cv-02221-NJK
)
Plaintiff,) UNOPPOSED MOTION FOR
) DEFENDANTS’ CARRIER
vs.) REPRESENTATIVE REBECCA
) BRENIA TO APPEAR
SECURITY 1st TITLE OF NEVADA, LLC;) REMOTELY AT EARLY
SYNDEO OUTSOURCING, LLC;) NEUTRAL EVALUATION
SYNDEO OUTSOURCING II, LLC; DOES)
I through X; and ROE Corporations XI)
through XX, inclusive)
)
Defendants.)
)

Defendants Security 1st Title of Nevada, LLC, Syndeo Outsourcing, LLC, and Syndeo Outsourcing II, LLC (collectively “Defendants”), by and through their counsel of record, Fisher & Phillips, LLP, file this Unopposed Motion for Defendants’ Carrier Representative Rebecca Brenia to Appear Remotely at Early Neutral Evaluation (“ENE”), which is set for March 25, 2025.

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Defendants' representatives and their counsel of record Jason Keck, Esq. of Fisher & Phillips, LLP will attend the ENE in person. However, Defendants' carrier representative Rebecca Brenia, is located in Houston, Texas and traveling to Nevada for the ENE on the scheduled date would impose logistical challenges and financial burdens that could be better devoted towards a potential resolution. Remote appearance would eliminate the need for travel, thereby reducing costs associated with airfare, accommodation, and other travel related expenses. Rebecca Brenia is a key participant in these discussions and has set aside the requisite time to be intimately involved in the ENE at the currently scheduled time and for the duration of the ENE. The use of audiovisual technology and/or telephone allows for Rebecca Brenia's effective participation in the ENE without compromising the quality of the proceedings.

For these reasons, Defendants respectfully request that Rebecca Brenia be permitted to appear remotely at the ENE. The lack of physical presence will not prevent Defendants' carrier representative Rebecca Brenia, who has set aside March 25 for the ENE, from being a full and fully engaged participant in the ENE.

Dated this 6th day of March, 2025.

FISHER & PHILLIPS LLP

By: /s/ Brandon A. Born

BRANDON A. BORN, ESQ.

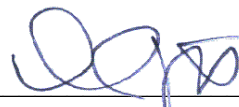
JASON KECK, ESQ.

300 S. Fourth Street, Suite 1500

Las Vegas, Nevada 89101

Attorneys for Defendants

The Court notes that the motion is titled an "unopposed" motion, but includes no language regarding any discussion between counsel for Defendants and counsel for Plaintiffs. Nonetheless, the Court accepts counsel's representation that the motion is unopposed and GRANTS the motion for remote appearance. (ECF No. 25). Defendant shall include an email address for Ms. Brenia in their evaluation statement so that she may receive a link to attend the ENE.



DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE

DATED: March 7, 2025

CERTIFICATE OF SERVICE

This is to certify that on the 6th day of March 2025, the undersigned, an employee of Fisher & Phillips LLP, electronically filed the foregoing **MOTION FOR DEFENDANTS' CARRIER REPRESENTATIVE REBECCA BRENIA TO APPEAR REMOTELY AT EARLY NEUTRAL EVALUATION** with the District Court, and a copy was electronically transmitted from the Court to the e-mail address for:

Christian Gabroy, Esq.
christian@gabroy.com
Kaine Messer, Esq.
kmesser@gabroy.com

By: /s/Nicole Reeb
An employee of Fisher & Phillips LLP